

Via Federal Express

November 24, 2010



Mr. Andrew Taylor
Enforcement Officer, SD-7-5, 8th Floor
U.S. Environmental Protection Agency, Region IX
Office of Environmental Cleanup, Mail Code ECL-115
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for Information Pursuant to CERCLA Section 104(e) for the former "C-6 Facility," Los Angeles County, California

Dear Mr. Taylor:

Enclosed is the response of The Boeing Company ("Boeing") to the United States Environmental Protection Agency's ("EPA") information request dated September 7, 2010 ("Information Request"). Boeing received the Information Request on September 13, 2010. EPA granted an extension until November 29, 2010, for submission of Boeing's response.

Boeing has made every attempt to provide a complete response at this time. Despite our diligent search, it is possible that additional facts and documents not currently known to Boeing may become known after the November 29, 2010 deadline. Boeing reserves the right to supplement its responses if such information is obtained.

If you have any further questions on the provided information or our response, please contact Leah Krider at (425) 373-7123.

Sincerely,


Steven L. Shestak
Director, Environmental Remediation

Enclosures: Response of The Boeing Company to EPA's Request For Information
Hard Drive

cc: Leah M. Krider
Bob Scott

**RESPONSE OF THE BOEING COMPANY TO U.S. EPA'S REQUEST FOR
INFORMATION PURSUANT TO CERCLA SECTION 104(e)
REGARDING THE FORMER C-6 FACILITY,
LOS ANGELES COUNTY, CALIFORNIA**

The following is the response of The Boeing Company ("Boeing") to the United States Environmental Protection Agency's ("EPA") information request dated September 7, 2010 ("Information Request"). Boeing received the Information Request on September 13, 2010. EPA granted an extension until November 29, 2010 for submission of Boeing's response.

The amount of potentially responsive information is voluminous, and a large amount of this information is already in the public domain through the ongoing EPA and California Regional Water Quality Control Board, Los Angeles Region-led activities associated with the former C-6 Site and the Montrose-Del Amo Superfund Site. Boeing has conducted an extensive search of its own files but has not conducted a search of information available in the public domain.

Boeing has made every attempt to provide a complete response within the deadline outlined in the Information Request, as extended by EPA until November 29, 2010. Despite our diligent search, it is possible that additional facts and documents not currently known to Boeing may become known after the November 29, 2010 deadline. Boeing reserves the right to supplement its responses if such information is obtained. This Response is Boeing's good faith effort to respond to the Information Request.

The responses contained herein are (i) made to the best of Boeing's knowledge at this time, (ii) based on information available to Boeing as of September 7, 2010, that has thus far been discovered, and (iii) based on reasonable efforts by Boeing to gather the requested information.

Boeing is providing its responses to the Information Request without waiving:

- (a) questions or objections as to competency, relevancy, materiality, privilege and admissibility as evidence for any purpose of the responses or subject matter thereof, in any subsequent proceeding involving Boeing;
- (b) the right to object on any ground to the use of these responses or the subject matter thereof, in any subsequent proceeding involving Boeing; and
- (c) the right to object on any ground at any time to other requests or discovery procedures involving or relating to the subject of these responses.

In addition, Boeing believes that many questions in the Information Request are overly broad and/or not reasonably calculated to lead to relevant information. Without waiving this objection, Boeing has attempted to respond appropriately to EPA's request. Because some of the terms and instructions used in EPA's Information Request are also overly broad, undefined, or ambiguous, Boeing has attempted to interpret and apply such terms and instructions reasonably as set forth below:

Instruction No. 3 requires Boeing to identify documents, persons, and sources consulted for each Request. However, persons who participated in providing information responsive to this Information Request are identified in Boeing's Response to Request No. 1 and are also often self-evident in the documents. To the extent EPA has additional questions on sources of information or documents, Boeing will endeavor to cooperate in providing EPA the best information available.

The term "you" is defined by EPA to include "contractors" of Boeing. However, contractors, by definition, are not agents or employees of Boeing. Thus, Boeing has limited ability to collect potentially responsive documents from contractors. To the extent such a collection was necessary to respond to the Information Request because Boeing did not have the relevant information or where information was more readily available from its contractors, Boeing endeavored to complete such a collection.

The term "identify" is defined to include personally identifiable information such as non-business contact information for employees and other individuals who provided information in response to the Information Request. Because of the sensitivity of this information, Boeing is not providing it in this response; however, we have provided EPA with a means for contacting these individuals through Counsel.

Boeing has made additional assumptions in responding to certain specific requests. Where applicable, these assumptions are generally identified at the beginning of the response. In addition, many of the questions overlap and the documents and responses should be reviewed in their entirety.

Please note that to the extent information responsive to this Request is confidential business information, we have marked the individual documents as confidential, identified them as such on the index of documents, and segregated those documents from the rest of the Response.

RESPONSES TO SPECIFIC REQUESTS

The following responses correspond to the numbered requests in the Information Request. All responses were prepared with the assistance and advice of counsel.

REQUEST NO. 1 *IDENTIFY those individuals who provided the KNOWLEDGE, INFORMATION or DOCUMENTS used to prepare the response to these questions. Include the full name, current title and duties, as well as past titles and duties, current address and telephone number, and tenure for each individual providing an answer for any of these questions.*

Response No. 1:

The following individuals participated in providing information responsive to this Information Request. We have included only job titles to the extent relevant to the individual's relationship with the former C-6 Site.

Jennifer L. Wiley, Environmental Remediation Engineer/Scientist

Robert M. Tomko, Environmental Engineer / Scientist
Scott N. Lattimore, Environmental Engineer / Scientist
William R. Pearce, Environmental Engineer / Scientist
Bob Scott, Environmental Remediation Engineer/Scientist
Steven L. Shestag, Director, Environmental Remediation
Jennifer Yutani, Paralegal, Office of the General Counsel
Leah M. Krider, Senior Counsel, Office of the General Counsel
Nancy Sheps, Facilities Multi-Service Manager
Salvatore M. Stavale, Corporate Real Estate Specialist
Kimberlie K. Nichols, Office Administrator
Alan E. Jennings, Business Operations Specialist
Roger L. Jackson, Facilities Analyst
Steven M. Chandler, Surplus Property Administration
Paul I. Emory, Facilities Multi-Services Manager

The individuals identified above can be contacted through the following counsel:

Leah Krider
Senior Counsel, Office of the General Counsel
The Boeing Company
2710 160th Avenue SE
Bellevue, WA 98008
(425) 373-7123
Leah.M.Krider@boeing.com

Corporate Status & Relationships

REQUEST NO. 2 *Please provide a brief history of The Boeing Company ("BC"), Boeing Realty Corporation ("BRC"), and the corporate status and structure of each, including date of incorporation, merger and acquisition history, parent and subsidiary relationships, and predecessor and successor INFORMATION.*

Response No. 2:

A brief historical summary of Boeing's corporate history as it specifically relates to the former C-6 Site is provided below and summarized in the timeline attached as Figure 1.

Boeing is an aerospace company and manufacturer of commercial jetliners and defense, space and security systems. McDonnell Douglas Corporation ("MDC") was formed as a result of the 1967 merger of Douglas Aircraft Company ("DAC") and McDonnell Aircraft Corporation. Boeing acquired the shares of MDC on August 1, 1997. Effective December 31, 2009, MDC was merged into Boeing.

McDonnell Douglas Realty Company ("MDRC") (formerly known as MDC Realty Company) was formed as, and throughout its corporate existence remained, a wholly owned subsidiary of MDC. On August 12, 1997, MDRC changed its name to Boeing Realty Corporation ("BRC") thereby making BRC a wholly owned subsidiary of MDC. BRC was formed as a

wholly owned subsidiary of MDC after the 1997 merger between Boeing and MDC in order to continue the ongoing functions and obligations of MDRC. MDRC currently exists as Boeing Real Property Management ("BRPM"), which is part of the "Shared Services Group" within Boeing.

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 3.

REQUEST NO. 3 *Please describe the current and former relationship between BC, BRC, McDonnell Douglas Corporation ("MDC"), and the Douglas Aircraft Company ("DAC"), and any other previous owners and operators at the PROPERTY. Please provide the dates and nature of any mergers, acquisitions, assumption of assets, or agreements regarding historical or future liabilities. Also include any contracts, leases or partnerships between the parties listed above and the dates within which these relationships existed. Please provide any DOCUMENTS supporting this description.*

Response No. 3:

Please see the response to Request No. 2. Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 3.

Ownership and Operations at the Property

REQUEST NO. 4 *Please provide the ownership history of the PROPERTY and the operational history during the time YOU owned or operated on the PROPERTY, as well as any previous ownership and operational history for which YOU have KNOWLEDGE, INFORMATION or DOCUMENTS. Please include dates of ownership and parcel, or parcels, owned, description and dates of any transfer of ownership, dates of operation and location of operations on the PROPERTY, the purpose of operation, and the dates of any change in purpose or operation.*

Response No. 4:

A timeline of the historical ownership and operational history of the former C-6 Site is provided in Figure 1 and briefly summarized below.

- Prior to 1941: The site was undeveloped farmland.
- 1941-1942: The site was developed by the Defense Plant Corporation as part of an aluminum production plant that was operated by Aluminum Corporation of America (ALCOA).
- 1944-1948: The site was used for warehousing of equipment by the War Assets Administration.
- 1948: Columbia Steel Company acquired the site; details of their operations are unknown.
- 1952: The U.S. Navy purchased the site and contracted with DAC to manufacture aircraft and aircraft parts there.
- 1970: DAC purchased the site.

- 1970-1992: DAC and its successor, MDC, owned and operated the site and continued manufacturing aircraft components.
- 1992: Most manufacturing operations ceased; a limited amount of assembly and warehousing continued through the early 2000s.
- 1994-1996: MDRC begins redevelopment of parts of the site.
- 1997 – 2002: Site redevelopment and parcel sales to third parties:
 - BRC sold Parcel A in 1998.
 - BRC sold Parcel B in 2001.
 - BRC sold Parcel C in 2002.
 - BRC sold Parcel D in 2000.

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 4.

REQUEST NO. 5 *Describe your functional operations at the PROPERTY, and other operators on the PROPERTY, for which YOU have KNOWLEDGE, prior to and after YOUR ownership, including specifically what product(s) was(were) manufactured and what service(s) was (were) provided, and all operational purposes for which the PROPERTY and the facilities on the PROPERTY were used.*

Response No. 5:

Functional operations at the Property when operated or owned by Boeing (and its predecessors) included the manufacture of detail parts and major sub-assemblies for Air Force and Navy aircraft, the heat treat of motor cases for missiles and the processing of skins for space vehicles. The parts and sub-assemblies were generally shipped to other locations such as the El Segundo and Long Beach plants for incorporation into completed aircraft and aerospace products. As the production of military aircraft in Southern California waned in the 1980's and early 1990's, the former C-6 site was transitioned to a parts warehousing and supply chain operation.

Boeing knows very little about the functional operations of predecessor operators at the Property, although we are aware that operations included an aluminum plant and use by a steel company.

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 5.

REQUEST NO. 6 *If parcels have been subdivided or merged over the years since this PROPERTY was first developed, please describe the changes in parcel boundaries, note old parcel numbers no longer in use, and indicate where this has occurred on a map of the PROPERTY.*

Response No. 6:

At the time the Property was acquired by MDC in 1970, it consisted of four land parcels named Parcels A through D respectively. As the former C-6 Site was redeveloped, the Property

was entitled and subdivided into a number of smaller parcels. Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 6.

REQUEST NO. 7 *Please describe any relationship between the past and current operations at the PROPERTY and the operations of Lawson Enterprises, Inc., Brand Plastics Company, Amoco Chemical Corporation, American Chemsolv, Inc., Trico Industries, Inc., B and W, Inc., and the Shell Synthetic Rubber Plant on nearby facilities located west and southwest of the PROPERTY. Such relationships shall include but should not be limited to transfer or sale of chemicals or WASTES between the companies or facilities, common use of WASTE handling and/or chemical storage structures and facilities, common sewer line connections or drainage structures, or shared operations and processing, etc. If any relationships are identified, please describe the reason and nature of the relationship. If any WASTES were received for chemical storage, chemical recycling, or as a staging or loading area for disposal, please so-indicate and IDENTIFY the dates within which this occurred. Provide all DOCUMENTS related to transfers, including but not limited to shipping and HAZARDOUS WASTE manifests, invoices, purchase orders, and accounting DOCUMENTS.*

Response No. 7:

After conducting a diligent search, Boeing is not unaware of any relationship between past or current operations at the Property and the entities listed above. We have no information to suggest the facilities or operations were connected in any way.

REQUEST NO. 8 *Please provide any KNOWLEDGE, INFORMATION or DOCUMENTS related to the chemical use history and presence of chemicals and HAZARDOUS SUBSTANCES at the PROPERTY. This should include but not be limited to all feedstock chemicals, raw materials, chemical intermediates, chemical products, stored chemicals, recycled or reclaimed chemicals, chemicals awaiting recycling or reuse, processing chemicals, or solvents (including but not limited to substances containing or consisting of PCE, TCE, DCE, TCA, DCA, vinyl chloride, methylene chloride; methyl ethyl ketone, acetone, or other ketones; benzol, petroleum spirits, xylene, toluene, benzene, ethylbenzene, chlorobenzene, or naphthalene (or any chemical isomers thereof)).*

Response No. 8:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 8.

REQUEST NO. 9 *Please describe the quantities of the chemicals used at the PROPERTY that were provided in response to the last question. Provide the maximum quantities of each chemical present at the PROPERTY at any point during the past and current operations at the PROPERTY.*

Response No. 9:

Information responsive to this Request was provided in Response No. 8.

REQUEST NO. 10 *Provide a map depicting the location(s) at the PROPERTY of all former and current structures which received, held, stored, or enclosed any of the substances listed or discussed in response to the last two questions. IDENTIFY which substances were received, stored, held, or enclosed by each structure. Examples of such structures are, but are not limited to, above ground tanks, below ground tanks, open tanks, dip tanks, pipelines, pits, surface impoundments, clarifiers, spray booths, product or WASTE recycling or rework units, drums, bins, shipping and commercial containers, or other receptacles, equipment or enclosures used during the operation of the facility.*

Response No. 10:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 10.

REQUEST NO. 11 *IDENTIFY the location at the PROPERTY of any and all machine shops, degreasing operations, and/or chemical recycling operations at the PROPERTY.*

Response No. 11:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 11.

REQUEST NO. 12: *If proprietary or trade-name solvents are provided in answer to any of the last four questions above, please IDENTIFY the chemical constituents of each. If DOCUMENTS, KNOWLEDGE, or INFORMATION within YOUR possession do not IDENTIFY all constituents, provide those for which YOU have KNOWLEDGE or INFORMATION, and any supporting DOCUMENTS. Please also indicate for each such solvent whether it contains or consists of PCE, TCE, DCE, TCA, DCA, vinyl chloride, methylene chloride; methyl ethyl ketone, acetone, or other ketones; benzol, petroleum spirits, xylene, toluene, benzene, ethylbenzene, chlorobenzene, or naphthalene (or any chemical isomers thereof) and which such chemicals each solvent contains.*

Response No. 12:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 12.

REQUEST NO. 13 *Please provide KNOWLEDGE, INFORMATION or DOCUMENTS related to the WASTE streams at the PROPERTY. For each WASTE stream, provide all KNOWLEDGE, INFORMATION or DOCUMENTS related to the process that produced it and its chemical content, including but not limited to whether it contains or consists of PCE, TCE, DCE, TCA, DCA, vinyl chloride, methylene chloride; methyl ethyl ketone, acetone, or other ketones; benzol, petroleum spirits, xylene, toluene, benzene, ethylbenzene, chlorobenzene, or naphthalene (or any chemical isomers thereof). Provide the maximum quantity of WASTE produced in each WASTE stream per month during these operations.*

Response No. 13:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 13.

REQUEST NO. 14 *Please describe and provide DOCUMENTS regarding any WASTE handling and WASTE disposal at the PROPERTY. IDENTIFY management of these WASTES prior to their disposal, recycling, sale or transport. Please describe and provide DOCUMENTS regarding:*

- a. How, when and where such WASTES were generated, stored, treated, transported, disposed or otherwise handled.*
- b. Provide a map depicting the location of all former and current structures which received WASTES, including but not limited to WASTE solvents containing or consisting of PCE, TCE, DCE, TCA, DCA, vinyl chloride, methylene chloride; methyl ethyl ketone, acetone, or other ketones; benzol, petroleum spirits, xylene, toluene, benzene, ethylbenzene, chlorobenzene, or naphthalene (or any chemical isomers thereof) and chemical mixtures containing or consisting of these compounds. Examples of such structures may include, but are not limited to, above ground tanks, below ground tanks, dip tanks, portable or mobile tanks, pipelines, pits, dry wells, evaporation ponds, wastewater treatment systems, surface impoundments, trenches, clarifiers, product or WASTE recycling or rework units; other receptacles, equipment or enclosures used during the operation of the facility; drums, sumps, spray booths, leach fields, sewer inlets, storm drain inlets, WASTE piles, bins, WASTE piles and landfills.*
- c. The maximum volume of WASTES stored at the PROPERTY at anyone time during these operations.*

Response No. 14:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 14.

REQUEST NO. 15 *Please describe and provide DOCUMENTS regarding any RELEASES of HAZARDOUS SUBSTANCES at the PROPERTY. Please describe and provide DOCUMENTS regarding:*

- a. When, where and how each such RELEASE occurred;*
- b. The amount of each HAZARDOUS SUBSTANCE RELEASED, and the area and volume of impacted soil.*
- c. Any and all activities undertaken in response to each such RELEASE or threatened RELEASE, including the notification of any governmental agencies about the RELEASE.*

Response No. 15:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 15.

REQUEST NO. 16 *Describe and provide DOCUMENTS regarding any permits issued under State, local, or Federal environmental laws for operators on the PROPERTY including, but not limited to, air, water, fire department, HAZARDOUS SUBSTANCE storage, and/or related to the*

Resource Conservation and Recovery Act (RCRA). Supply any and all identification numbers supplied by local governments, the State of California, the EPA or any other governmental agency related to the handling, treatment, storage, or disposal of HAZARDOUS WASTE on the PROPERTY. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to YOU by EPA, a State, or local government, for YOUR operations related to the PROPERTY.

Response No. 16:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 16.

Previous Environmental Investigation

REQUEST NO. 17 *Please IDENTIFY all contractors or consultants used in any sampling or evaluation of contamination at the PROPERTY including such contractors' contact information.*

Response No. 17:

The following companies have been retained by Boeing (and respective predecessors) to performed sampling and/or evaluation of the contamination at the Property:

Adventus Remediation Technologies
ARCADIS G&M
Arcadis/Geraghty Miller
Avocet Environmental, Inc.
CDM
CH2M HILL
Crosby & Overton Environmental Management, Inc.
CST Environmental, Inc.
Earth Tech
EMCON Associates
England Geosystem, Inc.
Environmental Science & Engineering, Inc.
Environmental Solutions, Inc.
Exponent
Forensic Analytical Specialties, Inc.
Geosyntec Consultants
Haley & Aldrich, Inc.
Harding Lawson Associates
Hargis + Associates, Inc.
Integrated Environmental Services, Inc.
James M. Montgomery Consulting Engineers, Inc.
Kennedy/Jenks Consultants
Laboratory Data Consultants Inc
Maness Environmental Services, Inc.
Montgomery Watson

NorCal Engineering
OGDEN Environmental and Energy Services
Paul V. Sandberg
PTS Laboratories
Richard C. Slade & Associates LLC
Rubicon Engineering
STL Los Angeles
T & T Environmental Services
Tait Environmental Management, Inc.
Terra Vac
Tetra Tech, Inc.
TRC Environmental Consultants, Inc.
URS Corporation
Western Laboratories
Woodward-Clyde Consultants

We ask that any requests to contact these contractors and consultants be made through the following Boeing counsel:

Leah Krider
Senior Counsel, Office of the General Counsel
The Boeing Company
2710 160th Avenue SE
Bellevue, WA 98008
(425) 373-7123
Leah.M.Krider@boeing.com

REQUEST NO. 18 *Please IDENTIFY (and list in chronological order) any and all cleanup and maintenance activities associated with structures which have handled HAZARDOUS SUBSTANCE at the PROPERTY. This should include but not be limited to any soil excavations, soil treatments, tank removals, drum removals, and spill cleanups. For each activity, provide date and nature of the activity, and describe the location, affected soil or debris volume, sampling locations and results, chemical CONTAMINANTS targeted by the action, soil or debris storage location(s) and conditions, and how, when and where such soils or debris were treated, transported, disposed or otherwise handled. Include INFORMATION describing any soil that was maintained in piles, bins, trucks, or in another unconsolidated form.*

Response No. 18:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 18.

REQUEST NO. 19 *Please fully describe any demolition or improvements that occurred while YOU had an interest in the PROPERTY, and the deposition of debris from such activities.*

Response No. 19:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 19.

REQUEST NO. 20 *Please provide copies of any DOCUMENTS YOU have pertaining to the treatment or disposal of soils excavated from the PROPERTY (e.g., invoices, contracts, and correspondence.*

Response No. 20:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 20.

REQUEST NO. 21 *Please provide KNOWLEDGE, INFORMATION or DOCUMENTS describing the topography, storm water flow, drainage, and/or runoff on the PROPERTY.*

Response No. 21:

Documents containing information responsive to this Request are identified in Attachment 1 as responsive to Request No. 21.

Figure 1 - Site Ownership & Operational History
Former C-6 Facility

